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VIA ECF AND EMAIL

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Ferrera v. Icahn School of Medicine at Mount Sinai, et al.
23 Civ. 8701 (JPC)**

Dear Judge Cronan:

On behalf of our clients, Icahn School of Medicine at Mount Sinai, Emma Guttman, M.D., Kathryn Tan, M.D., Tomlee Abraham ("Abraham"), Virginia Ortiz, and Sharaye Williams (collectively "Defendants"), and pursuant to the Court's Individual Rules of Practice 3(B), we write to make a request for a 2-day extension of the fact discovery deadline from August 18 to August 20, 2025 for the sole purpose of taking Abraham's deposition. The reason for this request is that the deposition had previously been scheduled, but had to be rescheduled due to a medical emergency. All other depositions in this case will be completed by August 12. This is the seventh request for an extension of the fact discovery deadline. The first six requests were granted. We communicated with counsel for Plaintiff and they consent to this request.

Respectfully submitted,

/s/ Brittany Buccellato

Brittany Buccellato

cc: Erica Healey-Kagan, Esq. and Loris Baechi, Esq., attorney for Plaintiff (via ECF and email)